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TGOING LTR NO.5870.2  
3RF 0267 **EG&G ROCKY FLATS**DIST. LTR ENG EG&G ROCKY FLATS, INC.  
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CK, C. X

PHER, N. X

BER, A. X

RES. CONTROL X X

WALLES, T. X

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CONFIDENTIAL

CLASSIFICATION:

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HORIZONTAL CLASSIFIER

SIGNATURE (UW)

TH. GOSLIN

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REPLY TO RFP CC NO:

TION ITEM STATUS

OPEN ☐ CLOSED

PARTIAL

R APPROVALS:

CML

SIG &amp; TYPST INITIALS

February 4, 1993

93-RF-0267

Frazer R. Lockhart  
Environmental Restoration Division  
DOE, RFOUSE OF WASTE PROCESS SYSTEM AND SOLAR POND WASTE TRANSFER LINE -  
EML-139-93

The Solar Evaporation Ponds at Rocky Flats currently receives water collected from the Interceptor Trench System (ITS). In April 1992, DOE, the Colorado Department of Health (CDH), and the Environmental Protection Agency (EPA) agreed to an Interim Measure/Interim Remedial Action (IM/IRA) to divert the trench water to the newly constructed modular surge tanks and, subsequently, to evaporators for treatment. This remedy was chosen to allow required closure activities for the ponds to proceed in accordance with the Rocky Flats Interagency Agreement (IAG), the Colorado Hazardous Waste Act (CHWA), the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the Resource Conservation and Recovery Act (RCRA), and the National Oil and Hazardous Substances Pollution Contingency Plan (NCP). The diversion is behind the schedule proposed in the IM/IRA Decision Document, and EG&G Rocky Flats is working to achieve the diversion by April 16, 1993.

In order to expedite the diversion of ITS water and to begin removing excess pond water as soon as possible, it will be necessary to use an existing waste transfer line which runs from the Solar Evaporation Ponds to Building 374. This line runs through Buildings 774, 771, 776, and 778. At several points the line penetrates building walls without secondary containment, which is non-compliant with secondary containment requirements. Additionally, several non-welded (bolted) valves exist along the line which are not secondarily contained. Similar situations exist for other lines at Rocky Flats, and other requirements, such as fire codes, also affect wall penetrations. We have contacted CDH, and they have indicated verbally that until the issue is resolved plant-wide, these lines can be used in their current configuration if compensatory measures are put in place.

EG&G Rocky Flats proposes to divert the trench water to the new modular tanks and use the waste transfer line to ship Interceptor trench water from the Solar Ponds tanks and pond water from the B ponds to Building 374 for treatment. Use of the transfer line is necessary to obtain compliance, per the IM/IRA. Additionally, expediting the ITS water diversion from the ponds will expedite the schedule for removing excess water from the B ponds. This will diminish the hydraulic driver for the contaminated sludge which currently has a potential to spread into the soil beneath cracked pond liners.

DOCUMENT CLASSIFICATION  
REVIEW WAIVER PER  
CLASSIFICATION OFFICE

ADMIN RECORD

A-DU04-000460

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Due to the lack of secondary containment in some sections of the transfer line, EG&G Rocky Flats will visually inspect such sections and, at each wall penetrated by the line, inspect around the penetration for signs of leakage as a compensatory measure. The inspection will be performed once per shift when the transfer line is in use. Additionally, work is underway to provide secondary containment to the bolted valves.

If the use and compensatory measure explained above is unacceptable, or if you have other direction regarding this measure, please contact me by February 5, 1993. For further discussion, please contact E. M. Lee, Solar Ponds Program Manager on 966-8648.



E. M. Lee  
Program Manager  
Solar Ponds Remediation Program  
EG&G Rocky Flats, Inc.

KCL:apt

Orig. & 1 cc - F. R. Lockhart

cc:  
J. K. Hartman - DOE, RFO